



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Central Region  
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Fresno, California 93710  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



Governor's Office of Planning & Research

**July 27 2021**

## STATE CLEARINGHOUSE

July 26, 2021

Teri Van Huss  
Tulare County Resource Conservation District  
3530 West Orchard Court  
Visalia, California 93277

**Subject: Case Mountain Fire Fuel Reduction Project (PROJECT)**  
**MITIGATED NEGATIVE DECLARATION (MND)**  
**SCH Number: 2021060278**

Dear Teri Van Huss,

The California Department of Fish and Wildlife (CDFW) received an Initial Study/Mitigated Negative Declaration from Tulare County for the above-referenced Project pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under Fish and Game Code.

While the comment period has passed, CDFW would appreciate if Tulare County would still consider our comments.

### CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish and G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on Projects and related activities that have the potential to adversely affect fish and wildlife resources.

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<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. For example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), related authorization as provided by the Fish and Game Code will be required.

**Nesting Birds:** CDFW has jurisdiction over actions with potential to result in the disturbance or destruction of active nest sites or the unauthorized take of birds. Fish and Game Code sections that protect birds, their eggs and nests include, sections 3503 (regarding unlawful take, possession or needless destruction of the nest or eggs of any bird), 3503.5 (regarding the take, possession or destruction of any birds-of-prey or their nests or eggs), and 3513 (regarding unlawful take of any migratory nongame bird).

**Fully Protected Species:** The Initial Study/Mitigated Negative Declaration provides analysis for multiple Fully Protected Species, including bald eagle, California condor and California wolverine. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish, pursuant to Fish and Game Code sections 3511, 4700, 5050, and 5515. CDFW prohibits and cannot authorize take of any fully protected species.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** Tulare County Resource Conservation District

**Objective:** Giant sequoia stands within the Case Mountain area are at risk from high-intensity wildfires. The objective of the Project is to implement fire fuel reduction activities on approximately 1,100 acres around these stands. The Project will be implemented in three phases, with the following primary activities for each phase:

- (1) The removal of hazardous trees and thinning of live trees within 200 feet of public roads in the area, to protect against wildfire and reduce risk of falling trees in public roadways. Both ground-based and cable-based extraction will be used, and woody biomass may be left in place and treated using lop and scatter, pile burning, chipping or mastication. Existing skid trails will be used for ground-based extraction, and for cable-based extraction, there will be full suspension through riparian areas and cable corridors will be spaced a minimum of 150 feet apart.
- (2) Thinning the mid-story of sequoia groves to reduce fuel load around legacy sequoia trees. Stands less than 21 inches in diameter at breast height (dbh) will be extensively thinned using chainsaws, chippers and masticators. Stands greater than 21 inches dbh will be lightly thinned using dozers, skidders, feller bunchers and potentially yarders. Post treatment canopy closure of stands greater than 21 inches

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dbh will be greater than 60%. Small and mid-sized trees will also be removed within 50 to 100 feet of legacy sequoia trees. Disposal methods include pile burning, mastication, chipping and underburning.

- (3) Fuels management to decrease fuel loads or rearrange ladder and surface fuels that contribute to high-intensity wildfire. Mastication, piling and burning, and underburning will be used to reduce small trees and brush. Burning will generally occur from November 15 to June 30, depending on fuel moisture and weather.

**Location:** The Project is in the Case Mountain area, approximately six miles east of the community of Three Rivers, approximately three miles west of Sequoia National Park, and approximately 30 miles east of Visalia. It is located in unincorporated Tulare County, California, at approximately 118.7841°W 36.4117°N (North American Datum (NAD) 1983).

**Timeframe:** This Project includes a three-phased approach over a 10-year period.

## COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Tulare County Resource Conservation District in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

Please note that the California Natural Diversity Database (CNDDDB) is populated by and records voluntary submissions of species detections. As a result, species may be present in locations not depicted in the CNDDDB but where there is suitable habitat and features capable of supporting species. Therefore, a lack of an occurrence record in the CNDDDB is not tantamount to a negative species finding. In order to adequately assess any potential Project related impacts to biological resources, surveys conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) and using the appropriate protocol survey methodology are warranted in order to determine whether or not any special-status species are present at or near the Project area.

There are many special-status resources present in and adjacent to the Project area. These resources may need to be evaluated and addressed prior to any approvals that would allow ground-disturbing activities. CDFW is concerned regarding potential impacts to special-status species including, but not limited to the State threatened and federally endangered fisher (*Pekania pennanti*), the State endangered foothill yellow-legged frog (*Rana boylei*), California Rare Plant Rank (CRPR) species including sequoia gooseberry (*Ribes tularense*), stream and riparian resources, and nesting birds. In order to adequately assess any potential impacts to biological resources, focused biological surveys should be conducted by a qualified wildlife biologist/botanist during the appropriate survey period(s) in order to determine whether any special-status species and/or suitable habitat features may be present within the Project area. Properly conducted biological surveys, and the

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information assembled from them, are essential to identify any mitigation, minimization, and avoidance measures and/or the need for additional or protocol-level surveys, and to identify any Project-related impacts under CESA and other species of concern.

Additionally, if significant environmental impacts will occur as a result of Project implementation and cannot be mitigated to less than significant levels, a Mitigated Negative Declaration (MND) would not be appropriate. Further, when an MND is prepared, mitigation measures must be specific, clearly defined, and cannot be deferred to a future time. When an Environmental Impact Review (EIR) is prepared, the specifics of mitigation measures may be deferred, provided the lead agency commits to mitigation and establishes performance standards for implementation. Regardless of whether an MND or EIR is prepared, CDFW recommends that the CEQA document provide quantifiable and enforceable measures, as needed, that will reduce impacts to less than significant levels.

#### **I. Environmental Setting and Related Impact**

**Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS)?**

#### **COMMENT 1: Fisher**

**Issue:** Fisher is a State threatened and federally endangered species. According to CNDDDB, multiple fisher have been detected within the Project area (CDFW 2021a). The Initial Study/Mitigated Negative Declaration notes that the Project would not be implemented without surveying the affected area for sensitive biological resources, but it also notes that “TCRCD would retain a qualified biologist or other qualified professional (Registered Professional Forester [RPF] or Certified Rangeland Manager [CRM] prior to implementation of any fuel reduction activities” (page 7). Given the level of difficulty of surveying for fisher and their status as a listed species, CDFW recommends clarification of how the species will be surveyed for, by whom, and if found, what mitigation measures will be implemented.

**Specific impact:** Without appropriate avoidance and minimization measures for fishers, potential significant impacts associated with Project activities include loss of habitat, den destruction, loss or reduction of productivity, reduction in health and vigor of young, and direct mortality.

**Evidence impact would be significant:** Fishers have experienced a substantial reduction in total range size within California since European settlement (Spencer et al. 2015). The southern Sierra Nevada population in particular is estimated to contain less than 300 adult fishers, with only a small proportion of the total population being breeding-age females (Spencer et al. 2015). Fishers have relatively low reproductive rates, since litters are small and young take two or more years to reach reproductive maturity (Spencer et al. 2015). This in addition to their relatively poor ability to disperse

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may slow population recovery following disturbance (Spencer et al. 2015). In addition, suitable fisher habitat in the southern Sierra Nevada occurs in a narrow band often separated by steep river canyons and other unsuitable habitat (Spencer et al. 2015). The small size of the southern Sierra Nevada fisher population, in addition to the narrow and fragmented band of suitable habitat it occupies, makes it vulnerable to disturbance. Current threats include habitat loss and fragmentation, rodenticides and other poisons, predation, disease, roads and other human structures, and climate change effects (Spencer et al. 2015).

### **Recommended Potentially Feasible Mitigation Measures:**

#### **Mitigation Measure 1A: Fisher Surveys**

The Initial Study/Mitigated Negative Declaration notes that the Project would not be implemented without surveying the affected areas for sensitive biological resources, however it is unclear whether a qualified biologist or another professional (RPF or CRM) will be used to conduct these surveys. Given the difficulty of surveying for fisher, CDFW recommends that a qualified biologist is used to perform surveys for the species. CDFW also recommends that survey methods are disclosed in order to determine if take will be avoided. Without adequate survey methods, there is the potential for unauthorized take if operations occur within suitable habitat during the natal and maternal denning period (March 1 to August 1).

#### **Mitigation Measure 1B: Fisher Avoidance**

In order to avoid unauthorized take of fisher, CDFW recommends that if a female denning fisher is detected during the denning period (March 1 to August 1), that timber operations cease within a ¼ mile of the detection and that CDFW and the United States Fish and Wildlife Service (USFWS) are immediately notified. If denning fisher are detected and the ¼-mile no-disturbance buffer is not feasible, consultation with CDFW is warranted to determine if the Project can avoid take. If fisher take cannot be avoided, acquisition of an Incidental Take Permit (ITP), pursuant to Fish and Game Code section 2081 subdivision (b) prior to vegetation- or ground-disturbing activities would be necessary to comply with CESA.

### **COMMENT 2: Foothill Yellow-Legged Frog (FYLF)**

**Issue:** The State endangered foothill yellow-legged frog is primarily stream dwelling and requires shallow, flowing water in streams and rivers with at least some cobble-sized substrate (Thomson et al. 2016). The Project site contains potential habitat and work may occur within the buffer zone of this species. Avoidance and minimization measures are necessary to reduce impacts to FYLF to a level that is less than significant.

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**Specific impact:** Without appropriate avoidance and minimization measures for FYLF, potentially significant impacts associated with the Project's activities include loss of habitat, reduced reproductive success, reduction in health and vigor of young, and direct mortality of individuals.

**Evidence impact would be significant:** FYLF populations throughout the State have experienced ongoing and drastic declines; in the Sierra Nevada specifically, it is estimated that they have been extirpated from 66% of their historic range (Thomson et al. 2016). The main threats to and likely causes of this decline include human activities that alter the natural hydrologic regimes of streams and rivers, land use changes that degrade or destroy riparian habitat, pesticides, disease, and invasive species (Thomson et al. 2016).

**Recommended Potentially Feasible Mitigation Measures:**

**Recommended Mitigation Measure 2A: FYLF Surveys**

CDFW recommends that a qualified wildlife biologist conduct protocol-level surveys for FYLF in areas where potential habitat exists. CDFW advises that visual encounter surveys follow the methodology described in the CDFW "Considerations for Conserving the Foothill Yellow-Legged Frog" (CDFW 2018a), to determine if FYLF are within or adjacent to the Project area. Please note that dip-netting would constitute take as defined by Fish and Game Code section 86, so it is recommended this survey technique be avoided. In addition, CDFW advises surveyors adhere to Appendix E "The Declining Amphibian Task Force Fieldwork Code of Practice" of the CDFW "Considerations for Conserving the Foothill Yellow-Legged Frog" (CDFW 2018a).

**Recommended Mitigation Measure 2B: FYLF Avoidance**

If FYLF are found during surveys or at any time during operations, it is recommended that CDFW is immediately contacted, and that adjacent suitable habitat is buffered by 40 feet during the seasonal dry period (May 1 to October 15) and 130 feet during the seasonal wet period (October 15 to May 1). If these buffers are not feasible, consultation with CDFW is warranted to determine if the Project can avoid take. If FYLF take cannot be avoided, acquisition of an ITP, pursuant to Fish and Game Code section 2081 subdivision (b) prior to vegetation- or ground-disturbing activities would be necessary to comply with CESA.

**COMMENT 3: Sequoia Gooseberry and Other California Rare Plant Rank (CRPR) Plant Species**

**Issue:** Sequoia gooseberry (CRPR 1B.3) and other CRPR 1 plant species are known to occur in the vicinity of the Project area (CDFW 2021a). However, they were not included in the list of special-status species with the potential to occur in the Project

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area (Table 1, pages 26 and 27). Sequoia gooseberry occurs in lower and upper montane coniferous forest habitat (CNPS 2021).

**Specific impact:** Without appropriate avoidance and minimization measures potential impacts to special-status plant species include loss of habitat, loss or reduction of productivity, inability to reproduce and direct mortality.

**Evidence impact would be significant:** Sequoia gooseberry and many of the CRPR-listed plant species above are threatened by vehicle and foot traffic, logging, overgrazing, road maintenance and the introduction of non-native plant species (CNPS 2021), which may be unintended impacts of the Project. Therefore, impacts of the Project have the potential to significantly impact populations of the species mentioned above.

#### **Recommended Potentially Feasible Mitigation Measures:**

##### **Recommended Mitigation Measure 3A: Focused Surveys**

While it is noted that botanical surveys will be conducted prior to operations, in the absence of another protocol, CDFW recommends that the Project area be surveyed for special-status plants by a qualified botanist following the “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities” (CDFW 2018b). This protocol, which is intended to maximize detectability, includes identification of reference populations to facilitate the likelihood of field investigations occurring during the appropriate floristic period. In the absence of protocol-level surveys being performed, additional surveys may be necessary.

##### **Recommended Mitigation Measure 3B: Special-Status Plant Avoidance**

CDFW recommends special-status plant species be avoided whenever possible by delineation and observing a no-disturbance buffer of at least 50 feet from the outer edge of the plant population(s) or specific habitat type(s) required by special-status plant species. If buffers cannot be maintained, then consultation with CDFW is warranted to determine appropriate minimization and mitigation measures for impacts to special-status plant species.

## **II. Editorial Comments and/or Suggestions**

**Lake and Streambed Alteration:** The Project description includes potential removal of vegetation within the riparian zone, burning of hand piles within the riparian zone, skid trail crossings through dry draws, and drafting of water for dust control on haul routes. In addition, the Project description notes that potential wetland resources are located within the Project area. Ground-disturbing activities that have the potential to change the bed, bank, and channel of streams and other waterways or alter riparian habitat, may be subject to CDFW’s regulatory authority pursuant Fish and Game Code section

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1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake; or (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent, as well as those that are perennial in nature.

For additional information on notification requirements, please contact our staff in the Lake and Streambed Alteration Program at (559) 243-4593. It is important to note, CDFW is required to comply with CEQA, as a Responsible Agency, when issuing a Lake or Streambed Alteration Agreement (LSAA). If inadequate environmental review has occurred for the Project activities that are subject to notification under Fish and Game Code section 1602, CDFW will not be able to issue the Final LSAA until CEQA analysis for the project is complete. This may lead to considerable Project delays.

**Nesting birds:** CDFW encourages that Project implementation occur during the bird non-nesting season; however, if ground-disturbing or vegetation-disturbing activities must occur during the breeding season (February through mid-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of the Migratory Bird Treaty Act or relevant Fish and Game Codes as referenced above.

To evaluate Project-related impacts on nesting birds, CDFW recommends that a qualified wildlife biologist conduct pre-activity surveys for active nests no more than 10 days prior to the start of ground or vegetation disturbance to maximize the probability that nests that could potentially be impacted are detected. CDFW also recommends that surveys cover a sufficient area around the Project site to identify nests and determine their status. A sufficient area means any area potentially affected by the Project. Prior to initiation of Project activities, CDFW recommends that a qualified biologist conduct a survey to establish a behavioral baseline of all identified nests. Once Project activities begins, CDFW recommends having a qualified biologist continuously monitor nests to detect behavioral changes resulting from the Project. If behavioral changes occur, CDFW recommends halting the work causing that change and consulting with CDFW for additional avoidance and minimization measures.

If continuous monitoring of identified non-listed bird species' nests by a qualified wildlife biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 500-foot no-disturbance buffer around active nests of non-listed raptors. If an active nest of a listed bird or Fully Protected species is found, CDFW recommends a minimum no-disturbance buffer of 0.25 mile for listed species and 0.5 miles for Fully Protected species, and that CDFW is immediately notified for more species-specific and site-specific mitigation measures. These buffers are advised to remain in place until the breeding season has ended or until a qualified biologist has determined that the birds have fledged and are no longer

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reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the Project site would be concealed from a nest site by topography. CDFW recommends that a qualified wildlife biologist advise and support any variance from these buffers and notify CDFW in advance of implementing a variance.

**Federally Listed Species:** CDFW recommends consulting with the USFWS on potential impacts to federally listed species including fisher. Take under the Federal Endangered Species Act (FESA) is more broadly defined than CESA; take under FESA also includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, nesting, or denning. Consultation with the USFWS in order to comply with FESA is advised well in advance of any ground disturbing activities.

## **ENVIRONMENTAL DATA**

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

## **FILING FEES**

If it is determined that the Project has the potential to impact biological resources, an assessment of filing fees will be necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

## **CONCLUSION**

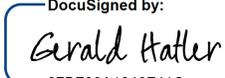
CDFW appreciates the opportunity to comment on the Project to assist Tulare County Resource Conservation District in identifying and mitigating the Project's impacts on biological resources.

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More information on survey and monitoring protocols for sensitive species can be found at CDFW's website (<https://www.wildlife.ca.gov/Conservation/Survey-Protocols>). If you have any questions, please contact Erin Duprey, Environmental Scientist, at the address provided on this letterhead, by telephone at (559) 243-4014 extension 259, or by electronic mail at [Erin.Duprey@wildlife.ca.gov](mailto:Erin.Duprey@wildlife.ca.gov).

Sincerely,

DocuSigned by:



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Gerald Hatler for Julie A. Vance  
Regional Manager

Attachment: MMRP for CDFW Recommended Mitigation Measures

cc: Office of Planning and Research, State Clearinghouse, Sacramento

ec: Rick Kuyper, U.S. Fish and Wildlife Service, [Richard.Kuyper@fws.gov](mailto:Richard.Kuyper@fws.gov)

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## REFERENCES

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**Attachment 1****CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE  
RECOMMENDED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)****PROJECT: Case Mountain Fire Fuel Reduction****SCH Number: 2021060278**

<b>RECOMMENDED MITIGATION MEASURE</b>	<b>STATUS/DATE/INITIALS</b>
<i>Before Disturbing Soil or Vegetation</i>	
Mitigation Measure 1A: Fisher Surveys	
Mitigation Measure 2A: FYLF Surveys	
Mitigation Measure 3A: Focused Surveys	
<i>During Operations</i>	
Mitigation Measure 1B: Fisher Avoidance	
Mitigation Measure 2B: FYLF Avoidance	
Mitigation Measure 3B: Special-Status Plant Avoidance	